10/6/05

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October 6, 2005

VIA MESSENGER

Tom Turner Associate Regional Counsel U.S.EPA - Region V Office of Regional Counsel 77 West Jackson Blvd. - C-14J Chicago, IL 60604

> Re: Response of American Greetings to Clayton Chemical General Notice of Potential Liability

Dear Mr. Turner:

This letter is written on behalf of American Greetings Corporation ("American Greetings") in response to the U.S.EPA's General Notice of Potential Liability with respect to the Clayton Chemical Site. (September 27, 2005) In that Notice, U.S.EPA requested a response within ten (10) days of receipt thereof. Therefore, American Greetings' must be viewed as having provided a timely response to that General Notice of Potential Liability.

American Greetings is willing to participate in the funding and/or implementation of the response actions listed in the General Notice to the extent such actions are consistent or not inconsistent with the National Contingency Plan. In conjunction with this expression of its willingness, American Greetings hereby reserves, and does not waive, all of its defenses, of whatever kind, to liability relating to the Clayton Chemical Site. Further, American Greetings' willingness to participate anticipates that such participation shall be in the context of an administrative or civil arrangement which will preserve American Greetings' potential contribution rights relating to this Site. American Greetings hereby expressly reserves all such rights. Finally, in expressing its willingness to participate, American Greetings anticipates that sufficient other parties will also participate so that allocable shares will be equitably distributed.



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With respect to further contact with American Greetings in this matter; communications should be directed to:

Barbara Magel Karaganis White & Magel Ltd. 414 North Orleans Street - Suite 810 Chicago, Illinois 60610 (312)836-1177 ext. 148 BMagel@K-W.com

With a copy to:

Rinda E. Vas
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If you have any questions with respect to American Greetings' position in this matter, please feel free to contact us. We look forward to working with U.S.EPA and other noticed parties to reach an equitable resolution of the Clayton Chemical matter.

Very truly,

Markara Mosel

Barbara Magel

BAM:sam

KARAGANIS, WHITE & MAGEL LTD.

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BY MESSENGER

77 West Jackson Blvd. - C-14J Associate Regional Counsel Office of Regional Counsel U.S.EPA - Region V 60604 Chicago, IL **Tom Turner**

